1			
2			
3			
4	The Above Space Reserved for the Clerk of Court		
5	GALLAGHER LAW, Prof. Corp.		
6	Kathleen H. Gallager, Esq. Nevada State Bar Number 15043		
7	1850 East Sahara Avenue, Suite 107 Las Vegas, Nevada 89104		
8	Telephone: (702) 744-8086 Email: <u>kathleen@legalmusclelv.com</u>		
9	ANDERSEN & BROYLES, LLP		
10	Karl Andersen, Esq. Nevada State Bar Number 10306		
11	5550 Painted Mirage Road, Suite 320 Las Vegas, Nevada 89149		
12	Telephone: (702) 220-4529		
13	Facsimile: (702) 834-4529 Email: karl@andersenbroyles.com		
14	Attorneys for Plaintiffs Injury Loans.com, LLC		
15	and Adam Stokes UNITED STATES DISTRICT COURT		
16	DISTRICT OF NEVADA		
16	INJURYLOANS.COM, LLC, a Nevada entity; ADAM STOKES, an individual,	Case No.: 2:18-cv-01926-GMN-VCF	
17	Plaintiffs,		
18	V.	STIPULATION AND ORDER TO	
19	SERGIO BUENROSTRO, an individual; SANDRA MARTINEZ, an individual;	EXTEND TIME FOR INJURYLOANS.COM, LLC TO FILE	
20	CITIBANK, N.A., an entity; S&S MARKETING CONSULTING, LLC, a Nevada	REPLY IN SUPPORT OF ITS MOTION TO EXCLUDE DESTROYED OR	
21	limited liability company,	UNPRESERVED ELECTRONIC EVIDENCE; MOTION TO LIMIT USE OF	
22	Defendants.	FORGED EMAILS AT TRIAL; OR IN THE ALTERNATIVE, MOTION FOR	
23	AND RELATED CLAIMS	ADVERSE INFERENCE INSTRUCTION	
24	AND RELATED CLAIMS	[FIRST REQUEST]	
25			
26	Plaintiffs/Counterdefendants Injuryloans.com, LLC and Adam Stokes (Plaintiffs)		
27	Defendants/Counterclaimant/Cross-Defendant Sergio Buenrostro (Buenrostro), Third Party		
	I .	, and the second se	

28

Defendant S&S Marketing Consulting, Inc. (S&S), and Defendant/Third-Party Citibank, N.A., stipulate as follows:

- 1. Plaintiffs filed their Motion to Exclude Destroyed or Unpreserved Electronic Evidence on Friday, April 16, 2021 [ECF No. 164].
- 2. Citi filed its Response to Plaintiff's Motion to Exclude Destroyed or Unpreserved Electronic Evidence on Friday, May 14, 2021 [ECF No. 174].
- 3. Buenrostro filed his Response to Plaintiff's Motion to Exclude Destroyed or Unpreserved Electronic Evidence on Friday, May 14, 2021 [ECF No. 175].
- The deadline for Plaintiffs to filed replies to support its motion to Exclude is 4. currently Friday, May 21, 2021.
- 5. The parties stipulate to an extension to allow Plaintiffs ten (10) business days from the current May 21, 2021 deadline. The new deadline to file the replies in support of their motions will be Friday, June 4, 2021.

///

///

///

22

23

24 25

26

27 28

2	to cause any undue delay or prejudice to any party.		
3	DATED May 21, 2021.		
4	HOGAN HULET PLLC	ANDERSEN & BROYLES, LLP	
5	/s/ Kenneth Hogan	/s/ Karl Andersen	
6	KENNETH E. HOGAN, ESQ. Nevada Bar No. 10083	KARL J. ANDERSEN, ESQ. Nevada Bar No. 10306	
7 8	JEFFREY L. HULET, ESQ. Nevada Bar No. 10621 1140 N. Town Center Drive, Suite 300 Las Vegas, Nevada 89144	ANDERSEN & BROYLES, LLP 5550 Painted Mirage Road, Suite 320 Las Vegas, Nevada 89149	
9	Attorneys for Sergio Buenrostro and S&S Marketing Consulting, LLC	KATHLEEN H. GALLAGHER, ESQ. Nevada Bar No. 15043 1850 East Sahara Avenue, Suite 107	
11		Las Vegas, Nevada 89104	
12		Attorneys for Injuryloans.com, LLC and Adam Stokes	
13	AKERMAN LLP		
14			
15	/s/ Donna Wittig		
16	ARIEL E. STERN, ESQ. Nevada Bar No. 8276		
17	DONNA M. WITTIG, ESQ. Nevada Bar No. 11015		
18	1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89144		
19	Attorneys for Citibank, N.A.		
20			
21			
22	IT IS SO ORDERED nunc pro tunc.		
23	Dated this 24 day of May, 2021.		
24			
25			
26	Gloria M. Navarro, District Judge		
27	UNITED STATES DISTRICT COURT		

This is the first request for an extension of this deadline. This Request is not made

6.

1

28